



THE HALL LAW FIRM

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Board Certified Personal Injury Trial Law
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August 16, 2019

Via Email: <https://foiaonline.gov/foiaonline/action/public/request>

FOIA Agent

Environmental Protection Agency
1201 Elm Street, Suite 500
Dallas, TX 75270

OPEN RECORDS REQUEST

Re: Arkema Chemical Facility – 18000 Crosby Eastgate Rd. Crosby, TX 77532

To Whom It May Concern:

Please accept this letter as our Firm's Open Records Request for true and correct copies of the following documents relating to the Arkema Chemical Facility:

1. Any and all reports (including drafts thereof), investigative materials, inquiries, examinations, analyses, interview notes, witness statements, tests etc. performed or obtained by your organization involving the Arkema Crosby Location.
2. Any and all fines, sanctions, penalties, punishments, reprimands etc. levied by your organization against the Arkema Crosby Location during the last 25 years.
3. Any and all surveys or topographical maps, drawings, diagrams, renderings etc. of the Arkema Crosby facility located at 18000 Crosby Eastgate Rd. Crosby, TX 77532 ("Crosby Location").
4. Any photos or videos of the Arkema Crosby Location.
5. Any correspondence, emails, communications with Arkema employees, agents, representatives relating to the Arkema Crosby Location or operations.
6. Any and all risk assessments or insurability studies performed by any insurance carrier, risk manager, risk assessment company, or other entity or person trying to assess or identify risk of loss or risk of liability issues at the Arkema Crosby Location during the last 25 years.

American Board
of Trial Advocates



7. Copies of any flood damage claims filed by or on behalf of Arkema relating to operations or its presence at the Crosby Location.
8. Any and all service documents and records relating to any work, studies, investigations, correspondence, results and/or requested or offered work performed at the Arkema Crosby Location at any time between August 31, 1997 and the present.

Reasonable costs and expenses to respond to this request will be remitted. Should you have any questions, please do not hesitate to call us at (713) 942-9600. We can also be reached at the address indicated above. We thank you in advance for your time and attention to this matter.

Sincerely,

/s/ Ryan Finnegan

Ryan Finnegan